

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JOHN SABAL

Plaintiff,

v.

LIN WOOD

Defendant.

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Civil Action No. 4:23-CV-00551-O

**DEFENDANT’S APPENDIX TO BRIEF IN SUPPORT OF MOTION TO
DISMISS COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

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**ATTORNEYS FOR DEFENDANT
LIN WOOD**

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Respectfully submitted,

/s/ John T. Wilson IV
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**ATTORNEYS FOR DEFENDANT
LIN WOOD**

CERTIFICATE OF SERVICE

This is to certify that on this 4th day of August, 2023, a true and correct copy of the above and foregoing document was served upon all counsel of record via the Court's CM/ECF system in accordance with the Federal Rules of Civil Procedure.

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ATTORNEYS FOR JOHN SABAL

/s/ John T. Wilson IV
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JOHN SABAL

Plaintiff,

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Civil Action No. 4:23-CV-00551-O

**AFFIDAVIT OF LIN WOOD IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

**STATE OF GEORGIA §
 §
FULTON COUNTY §**

BEFORE ME, the undersigned authority personally appeared Lin Wood who after being sworn upon his oath, deposed and said as follows:

1. My name is Lin Wood. I am over the age of twenty-one and competent in all respects to make this affidavit. I have never been convicted of a felony or crime involving moral turpitude. I am the Defendant in this lawsuit, and I have personal knowledge of the facts stated herein and they are true and correct.

2. I am a citizen of South Carolina and have lived in Yemassee, South Carolina, since February 2021. Prior to my recent retirement, I practiced law in Atlanta, Georgia, where I maintained a residence. I do not use, possess, lease, or have any interest in any property in Texas.

3. I was licensed to practice law by the State Bar of Georgia in 1977. From that time until my retirement on July 4, 2023, I have taken on many high-profile cases across the country.

4. During my 46-year career as an attorney, I recall handling only two matters in Texas. However, those matters were over ten years ago and wholly unrelated to the allegations in Plaintiff's Complaint. I have never been licensed to practice law in Texas, and in the matters I handled in Texas, I appeared pro hac vice. Moreover, I have never advertised my services in Texas.

5. My daily business and activities do not concern Texas. My only current connection with Texas is my service as a director of #FightBack Foundation, Inc. ("#FightBack"), which is a non-profit corporation incorporated in Texas. But while #FightBack maintains a registered agent in Texas, #FightBack's principal office and all corporate activities are conducted in Atlanta, Georgia, and concern national issues. #Fightback uses a P.O. Box in Georgia as its mailing address.

6. I did not know Plaintiff resides in Texas prior to receiving a copy of Plaintiff's complaint. I learned of Plaintiff's residence in Texas by reading Plaintiff's complaint. My only interactions with Plaintiff have been at my property in South Carolina, through online social media, or through text messages. I have never traveled to Texas to meet with Plaintiff or attend any event organized by Plaintiff.

7. The primary method by which I communicate with my national following is through the social media and messaging platform, Telegram. I run a public channel on Telegram, which anyone can follow or join free of charge. As such, anyone with internet access can view the content I post. I currently have over 360,000 followers on Telegram. I do not know the vast majority of my followers or where they live.

8. All of the events or actions that I reference in my Telegram posts that form the basis of Plaintiff's complaint occurred in South Carolina. In fact, the Patriot event that I refer to in the Telegram posts cited by Plaintiff concerned an event that was scheduled to take place in South Carolina.

9. Further, the podcast I produce, Tomotley Talks, is recorded and produced in South Carolina at my property in Yemassee.

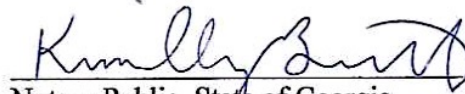
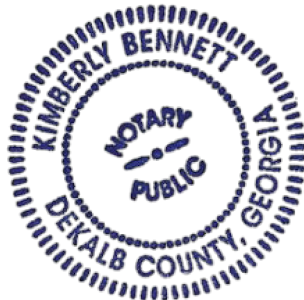
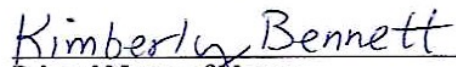
10. I declare under penalty of perjury that every statement in the foregoing is within my personal knowledge and is true and correct.

FURTHER, Affiant sayeth naught.



Lin Wood

SUBSCRIBED AND SWORN TO BEFORE ME by Lin Wood on this the 1 day of August 2023.


Notary Public, State of Georgia
Printed Name of Notary